

EXHIBIT D

11/23/2019

Dunlap Coddling PC Mail - Re: Terves v. Yueyang; Our Docket No. 2189.001



Evan Talley <etalley@dunlapcoddling.com>

Re: Terves v. Yueyang; Our Docket No. 2189.001

Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>

Thu, Oct 17, 2019 at 2:19 PM

To: Evan Talley <etalley@dunlapcoddling.com>, "Cupar, David B." <dcupar@mcdonaldhopkins.com>

Cc: Julie Oseland <joseland@dunlapcoddling.com>, Ecometal/Yuan Patent Infringement Litigation <ecometal-lit@dunlapcoddling.com>

Evan,

Attached is a draft protective order for your review. This is based on the ND of Ohio's standard order for patent cases, which you reference in your email. The redlines show the proposed changes to the standard protective order.

Let me know if you have any edits, questions, or want to discuss further.

Thanks,

Matt

Matt Cavanagh
Member

T: 216.348.5730
F: 216.348.5474
mcavanagh@mcdonaldhopkins.com
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Suite 2100
Cleveland, OH 44114

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From: Evan Talley [mailto:etalley@dunlapcoddling.com]

Sent: Monday, October 14, 2019 3:34 PM

To: Cavanagh, Matthew J.; Cupar, David B.

Cc: Julie Oseland; Ecometal/Yuan Patent Infringement Litigation

Subject: Re: Terves v. Yueyang; Our Docket No. 2189.001

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Matt and David -

As the parties have already commenced discovery, we should discuss the protective order to be entered in this case. I note Exhibit A to the local patent rules is a form protective order for patent cases. I assume that's where Plaintiff intends to start. Either way, let me know when we can expect a draft.

We should also begin discussing availability for the Rule 26 conference.

Evan

Evan W. Talley, Esq.

Dunlap Coddling P.C.
The Film Row District
609 W. Sheridan Avenue
Oklahoma City, OK 73102
405-607-8600 / 405-607-8686 (f) / 405-361-0353 (m)
<http://www.dunlapcoddling.com>

My paralegal is Julie Oseland. Please feel free to contact her at josedland@dunlapcoddling.com or 405-607-8600 if you need additional assistance.

We invite you to visit DC on Film Row – our free community and arts space in the heart of Oklahoma City. www.dcfilmrow.com

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On Mon, Oct 7, 2019 at 1:31 PM Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com> wrote:

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From: Julie Oseland [mailto:joseland@dunlapcoddling.com]
Sent: Monday, October 07, 2019 2:21 PM
To: Cavanagh, Matthew J.
Cc: Ecometal/Yuan Patent Infringement Litigation
Subject: Terves v. Yueyang; Our Docket No. 21859.001

Good afternoon,

We are in receipt of interrogatories and requests for production of documents to both Defendants. Could you please forward a Word version of each of these documents at your convenience.

Thank you.

Julie

Julie Oseland, CP
Community Outreach Director
DUNLAP CODDING, P.C.
The Film Exchange District
609 W. Sheridan Avenue
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Tel: 405-607-8600, ext 643
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